APR 4 to

## Return Receipt

Mr. Edward L. Kropp Environmental Affairs Director Appalachian Power Company Post Office Box 2021 Roanoke, VA 24022

Re: WVD 980554703 Philip Sporn Plant

Dear Mr. Kropp:

Your letter of February 23, 1984 requested that Appalachian Power be withdrawn from the hazardous waste program as a treatment, storage, or disposal facility. This letter outlines specific procedures to follow for facilities who wish to withdraw Part A of the application for a permit under the Resource Conservation and Recovery Act (RCRA).

If you have decided that a RCRA permit is required, a Part B application must be submitted to EPA no later than October 11, 1985. This letter is therefore a formal request for a Part B RCRA application under the authority of 40 CFR §270.10.

If you still wish to withdraw from the system, then a letter stating you are not going to submit a Part B application should be submitted within 30 days of receipt of this letter. This correspondence should also indicate if closure is required for any hazardous waste unit. If you are required to follow postclosure care activities you must submit a post-closure permit application by October 11, 1985, and obtain a permit as outlined in 40 CFR §264.117.

Section 3004(u) of the recently enacted Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization) requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit. This requirement applies to operating units as well as those that are closing or have been closed in the past.

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EPA Region III will soon send a letter explaining this provision of the reauthorized Act in more detail and requesting additional information to determine if any solid waste management units need corrective action.

If you have any questions, please contact Mr. Harry Harbold at (215) 597-9287.

Sincerely,

Stephen R. Wassersug, Director Hazardous Waste Management Division

cc: WVDNR

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(See Reverse)

RECEIPT FOR CERTIFIED MAIL

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#### APR 9 1985

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Edward L. Kropp Environmental Affairs Director Appalachian Power Company P. O. Box 2021 Roanoke, VA 24022

Dear Mr. Kropp:

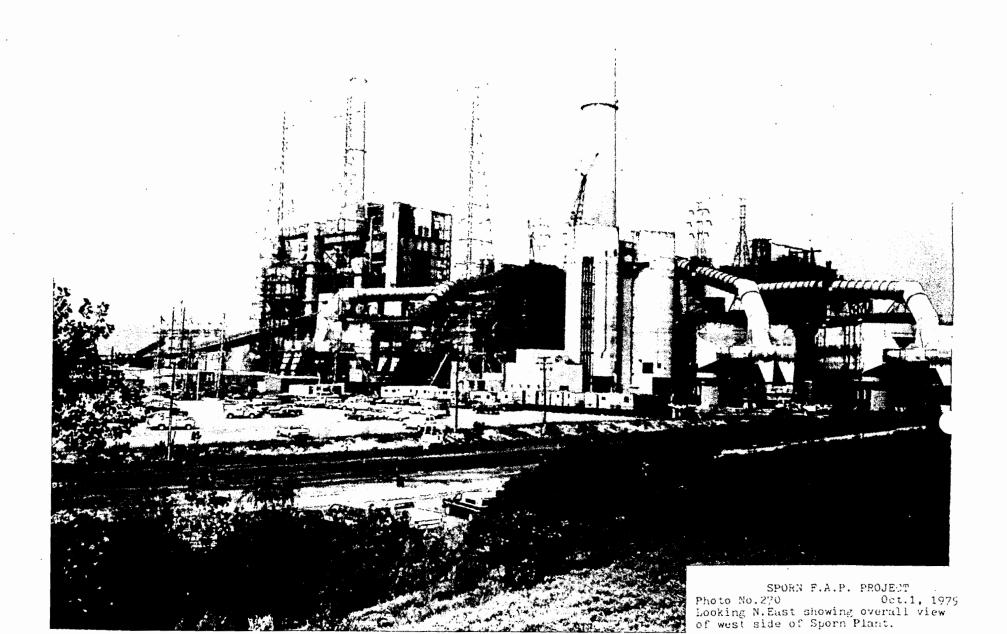
Last week you should have received the original of the enclosed letters. Due to an oversight, it was not mailed certified. In order to complete our records, we are enclosing a certified copy.

I regret any inconvenience this may cause you. Please contact Joan Henry, a member of my staff, at (215) 597-7259 if you have any questions.

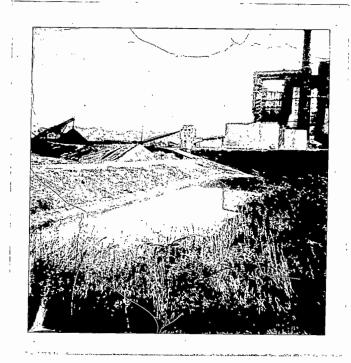
Sincerely,

Robert E. Greaves, Chief VA/WV Section Waste Management Branch

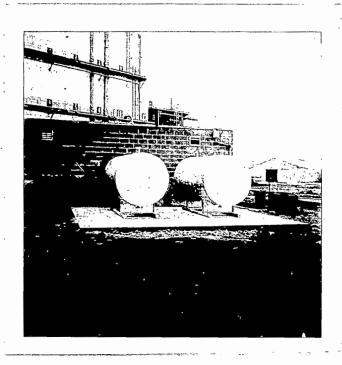
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This is how the Philip Sporn Plant looks following completion of an \$84.7-million project involving the installation of new electrostatic precipitators on all five units. The new precipitators are designed to remove 99.7 percent of ash particles from burning coal before they are emitted from the plant's stacks.



Metal Cleaning Waste Pond 1 Million Gallon Capacity Photo Taken on October 21, 1980



Waste Oil and Waste Solvent Tanks 2 - 2500 Gallon Tanks

Waste Solvent Temporary Storage in 55 Gallon Drums at Right.

Photo Taken on October 21, 1980

## ATTACHMENT TO HAZARDOUS WASTES APPLICATION (Form 1 and Form 3)

The information submitted below will supplement Form 1 and Form 3 data with the goal of clarification:

#### Form 1

Topo Map: Philip Sporn Plant and Mountaineer Plant are both electric generating stations on adjacent properties. Each has a permit application.

#### Form 3

Item II: The first generating unit was put into service on January 1, 1950, with the four later units as listed: Unit 2 - July 1, 1950; Unit 3 - August 1, 1951; Unit 4 - February 1, 1952; and Unit 5 - December 31, 1960.

Item III: The hazardous wastes handled at this facility consist of used cleaning solvents and metal cleaning wastes. Used cleaning solvents are stored in drums or tanks prior to burning in plant boilers for Btu value. Metal cleaning wastes are generated only during a boiler tube cleaning operation occurring approximately once per year. Metal cleaning wastes from Unit 5 are treated in the metal cleaning waste basin. Treatment takes approximately two weeks for the solution.

Metal cleaning wastes from Units 1 through 4 are different solutions and may or may not be hazardous depending upon several variables. These metal cleaning wastes are stored in temporary tanks until burned in the plant boilers (TO4).



RECEIVED RCRA SUPPORT SECTION

AUG 14 1985

U.S. EPA, Region III

August 8, 1985

CERTIFIED LETTER

Mr. Robert Kramer, Chief RCRA Support Section U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, Pennsylvania 19107

Re: Permit Withdrawal Report
Appalachian Power Company
Philip Sporn Plant
EPA I.D. No. WVD980554703

Dear Mr. Kramer:

Confirming our conversation of August 7, 1985, concerning your letter of August 5, 1985, (copy attached) requesting information under Section 3019 of RCRA, I am attaching a copy of correspondence dated February 23, 1984, in which Appalachian Power Company withdrew its RCRA Part A application for the referenced facility.

Since the facility withdrew from RCRA program without treating, storing, or disposing of hazardous wastes on-site, the information requested is not required.

If you should have further questions concerning this matter, please contact me at (703) 985-2376.

Sincerely,

Danny L. Gray, P.E.

Environmental Engineer Senior

DLG:d

Attachment

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 841 Chestnut Building (156789)

841 Chestnut Building 156 786
Philadelphia, Pennsylvana 19107

APCO ENV. AFFAIRS

AUG 5 1985

Mr. R.E. Northup Env. Aff. Dir. Appalachian Power Co. P. Sporn Plant P.O. Box 2021 Roanoke, VA 24022

Dear Mr. Northup:

Section 3019 of the Hazardous and Solid Waste Amendments of 1984 establishes a program for the collection, reporting, and analysis of information on the potential human exposure from releases of contaminants from hazardous waste landfills and surface impoundments. Attached is the Permit Applicant's Guidance Manual for Exposure Information Requirements Under RCRA Section 3019. This manual provides the items that must be addressed in the Exposure Information Report (EIR) submitted by the applicant.

As can be seen from the attached, facilities that have submitted Part B applications, post closure permit applications, or closure plans are required, by statute, to submit the EIR by August 8, 1985. Please submit either all of the required information or whatever information you can obtain and a detailed schedule for getting the balance of information into EPA, Region III.

Any questions regarding specific information that must be submitted should be directed to Samuel Rotenberg (see appendix B). The EIR should be sent to me and a copy to the appropriate State agency (see appendix C).

EPA is aware of the short time frames and if there is anything that we can do to help, please feel free to call 597-3159.

Sincerely yours,

Robert Kramer, Chief RCRA Support Section

cc: Samuel Rotenberg Robert Greaves Hank Sokolowski Patrick Anderson



February 23, 1984

CERTIFIED LETTER

Ms. Joan Henry (3HW32)
U. S. Environmental Protection Agency
Region III
Sixth and Walnut Streets
Philadelphia, Pa. 19106

Re: Permit Withdrawal Report Appalachian Power Company Philip Sporn Plant

EPA I.D. No. WVD980554703

Dear Ms. Henry:

On November 17, 1980, Appalachian Power Company (APCo) submitted to U. S. EPA, Region III, a hazardous waste permit application for the above facility in accordance with the Resource Conservation and Recovery Act (RCRA). The application was submitted as a precautionary measure to obtain interim status; however, to date no hazardous wastes have been treated, stored, or disposed.

Since APCo does not anticipate on-site treatment, storage, or disposal in the future, we are hereby withdrawing the Part A application and will not file a Part B application. Any hazardous waste that may be generated will be accumulated on-site for ninety days or less for off-site disposal.

If you have any questions concerning this letter or the facility, please call me at (703) 985-2429.

Sincerely,

Edward L. Kropp

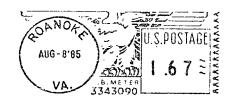
Environmental Affairs Director

ELK:DLG:dd

CC: Ms. Bonnie Guy
U. S. EPA, Region III
Philadelphia, Pa. 19106



Post Office Box 2021, Roanoke, Va. 24022



Mr. Robert Kramer, Chief RCRA Support Section U. S.Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, Pennsylvania 19107

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